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Filing date: **11/12/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92056362
Party	Defendant Milano Bags Inc.
Correspondence Address	MATTHEW H SWYERS THE TRADEMARK COMPANY PLLC 344 MAPLE AVENUE WEST, SUITE 151 VIENNA, VA 22180 UNITED STATES mswyers@thetrademarkcompany.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Matthew H. Swyers
Filer's e-mail	mswyers@thetrademarkcompany.com
Signature	/Matthew H. Swyers/
Date	11/12/2014
Attachments	MOTION WITH CONSENT TO EXTEND DATES.pdf(90734 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board

Registration No. 4,215,599
For the mark MILANO BAGS,
Registered on the Supplemental Register on September 25, 2012.

Milano Series International Products, LTD.,	:	
	:	
Petitioner,	:	
	:	
vs.	:	Cancellation No. 92056362
	:	
Milano Bags, Inc.,	:	
	:	
Registrant.	:	

CONSENT MOTION TO EXTEND DATES

COMES NOW Registrant, Milano Bags, Inc., (hereinafter “Registrant”) by counsel, with consent of Petitioner, and respectfully requests that the remaining dates in the instant cancellation proceeding be extended for a period of 120 days for good cause shown. Pursuant to 37 C.F.R. 2.128, the requested extension has not been made for purposes of mere delay; but, rather, due to conflicting travel schedules the parties have been unable find a mutually convenient date for Petitioner to conduct its deposition of Registrant’s principals noted pursuant to FRCP Rule 30(b)(6). As such, an extension of time is necessary in order to complete the aforementioned discovery deposition.

The parties have conferred regarding the proposed extension and Petitioner’s counsel has consented to the requested extensions proposed in this Motion by e-mail on November 12, 2014 to Counsel for Registrant.

Wherefore, it is respectfully requested that the remaining dates in this matter be extended as follows:

Deadline	Current Deadline	New Deadline
Expert Disclosures	November 11, 2014	March 12, 2015
Discovery Closes	December 11, 2014	April 11, 2015
Plaintiff's Pretrial Disclosures	January 25, 2015	May 26, 2015

Plaintiff's Trial Period Ends	March 11, 2015	June 10, 2015
Defendant's Pretrial Disclosures	March 26, 2015	July 25, 2015
Defendant's 30-day Trial Period Closes	May 10, 2015	September 8, 2015
Plaintiff's Rebuttal Disclosures	May 25, 2015	September 25, 2015
Plaintiff's 15-day Rebuttal Period Ends	June 24, 2015	October 23, 2015

Respectfully submitted this 12th day of November, 2014.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

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Counsel for Registrant

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Registrant.	:	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing this 12th day of November 2014, to
be served, via first class mail, postage prepaid, upon:

Roberta S. Bren, Esq.
Oblon, Spivak, McClelland,
Maier & Neustadt, P.C.
1940 Duke Street
Alexandria, Virginia 22314

/Matthew H. Swyers/
Matthew H. Swyers